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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Advanced Television Systems and ) MM Docket No. 87-268  
Their Impact upon the Existing )  
Television Broadcast Service )

**COMMENTS OF THE  
GEORGIA PUBLIC TELECOMMUNICATIONS COMMISSION  
ON THE EX PARTE SUBMISSION OF  
THE ASSOCIATION FOR MAXIMUM SERVICE TELEVISION, INC.**

The Georgia Public Telecommunications Commission, licensee of noncommercial educational television Station WGTV, Channel \*8, Athens-Atlanta, Georgia ("GPTC"), hereby submits these Comments in support of the proposal in the November 20, 1997 Ex Parte Submission of the Association for Maximum Service Television, Inc. ("MST")<sup>1</sup> to change the DTV channel assigned to Station WPBA(TV), Atlanta, from Channel 21 to Channel 29.<sup>2</sup> Station WGTV was assigned DTV Channel 22 by the Commission in the *Sixth Report and Order* in this proceeding and according to engineering studies completed after the release of that decision, operation of Station

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<sup>1</sup> See, Ex Parte Submission Based on New Technical Discoveries to Help the Commission Improve the DTV Table of Allotments/Assignments Submitted By the Association for Maximum Service Television, Inc. and Other Broadcasters ("Ex Parte Submission") filed on November 20, 1997.

<sup>2</sup> By Public Notice released on December 3rd, the Commission invited interested parties to file Comments on the MST submission by December 17, 1997.

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WGTV and Station WPBA on adjacent DTV channels will result in unacceptable levels of interference to the reception to both Stations. The MST proposal solves that problem.

As MST notes in its Ex Parte Submission, testing by the Advanced Television Technology Center ("ATTC") completed after the release of the *Sixth Report and Order* in this proceeding demonstrates that the separation criteria for adjacent channel DTV stations used by the Commission in generating the Table of Allotments understated the extent of interference in a real-world environment.<sup>3</sup> The ATTC's results indicate that the undesired-to-undesired ratios between first adjacent DTV stations should be -21 dB and -23 dB (lower and upper, respectively) rather than the -42 dB and -43 dB employed by the Table.

MST identified some 250 adjacent DTV channel assignments in the FCC's Table affected by the results of the ATTC data. Station WGTV, Athens, and Station WPBA(TV), Atlanta, which were assigned DTV Channels 22 and 21, respectively, by the Commission, were among the stations MST indicated were short-spaced in light of the ATTC findings. The transmitter sites of the two stations are only 18.3 km apart and both stations provide city grade coverage to Atlanta. In its Table, MST proposes to assign Station WPBA(TV) DTV Channel 29 instead of DTV Channel 21, while keeping Station WGTV's DTV assignment at Channel 22. Assigning Channel 29 to Station WPBA(TV) will, according to the material submitted by MST, increase WPBA(TV)'s interference free service area by 2,211 sq. km or 14%, and 176,000 persons or 6.2% while avoiding interference to Station WGTV. In addition, WPBA will replicate 96.3% of its current

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<sup>3</sup> Ex Parte Submission at 5-6.

service area if it operates on DTV Channel 29, as compared to 86.9% under the Commission's proposal.

Since both Station WGTV and Station WPBA(TV) are noncommercial educational stations, the MST Table will not only reduce interference between the two stations, but will also assure that the audiences which rely on those stations for their public television programming will be able to continue receiving that programming during the transition to digital television. Accordingly, GPTC urges the Commission to adopt the MST proposal and assign DTV Channel 29 to Station WPBA(TV) and to make such other changes in the DTV Table of Allotments as may be necessary to make that allotment.

Respectfully submitted,



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December 17, 1997


CERTIFICATE OF SERVICE

I, Cynthia T. Miller, do hereby certify that I have on this 17th day of December, 1997, caused copies of the foregoing COMMENTS OF THE GEORGIA PUBLIC TELECOMMUNICATIONS COMMISSION ON THE EX PARTE SUBMISSION OF THE ASSOCIATION FOR MAXIMUM SERVICE TELEVISION, INC. to be delivered by first-class, United States mail, postage prepaid to the following:

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